

REMARKS/ARGUMENTS

1. Claims 1 and 15 Comply with the Enablement and Definiteness Requirements

The Examiner rejected claims 1 and 15 as not satisfying the enablement requirement of 35 U.S.C. §112, par. 1 on the grounds the language that “the mapping is used to map and convert files from the host file system to the local file system to support remote editing” is not supported by the Specification. (Final Office Action, pg. 2) Applicants traverse.

During the phone interview and in the Final Office Action, the Examiner questioned whether the Specification discloses converting the files from the host file system to the local file system as claimed. The Specification discloses mapping between a host directory path and file on the host file system and a file on the local file system. (Specification, pg. 12, lines 17-29; pg. 13, lines 8-13 and 23-25). The Specification further discloses that the mapping also indicates a transfer type that defines how data will be transferred and translated between the host and workstation for this mapping. (Specification, pg. 16, lines 8-11, pg. 18, lines 23-27.) The Specification discloses that this mapping involves a “conversion” because “a text transfer translates translatable text using host and local code pages from one another.” (Specification, pg. 18, lines 23-27). Thus, when mapping files from the host to the local file systems, the Specification discloses that certain types of transfers involve translation or conversion of the content of the text. Thus, Applicants submit that the Specification discloses a mapping that is used to map and convert files from the host to local file systems to support remote editing. Accordingly, Applicants submit that the enablement rejection should be withdrawn.

The Examiner further rejected claims 1 and 15 as indefinite (35 U.S.C. §112, par. 2) on the grounds that there is insufficient antecedent basis for the limitation of a mapping used to convert files from the host file system to the local file system. (Final Office Action, pg. 2) Applicants traverse this finding because the elements in this phrase are either recited for the first time, so their own recitation provides the antecedent basis, or have antecedent basis previously in the claims.

For instance, the element “files” in this limitation provides its own antecedent basis, i.e., there is no definite article preceding the first use of the word “files”. Further, the terms “host file system” and “local file system” find antecedent basis in the preamble. Thus, Applicants submit that there is sufficient antecedent basis in these claims.

Accordingly, Applicants submit that the indefiniteness rejection under 35 U.S.C. §112, par. 2 should be withdrawn.

2. Claims 1-21 are Patentable Over the Cited Art

The Examiner rejected claims 1-21 as obvious (35 U.S.C. §103) over Stedman (U.S. Patent No. 6,081,837), Imai (U.S. Patent No. 6,148,334), and Harvey (U.S. Patent No. 6,519,568). Applicants traverse.

Claims 1 and 15 concern providing information describing a file system connection between a local file system located on a local system and a host file system located on a host system, said method comprising: encoding the information in a metalanguage format comprising one or more tags, each tag having an identifier and a set of one or more attributes, wherein the encoded information comprises a file system connection descriptor; said file system connection descriptor comprising: a local system data structure comprising at least one tag representing the local file system; a host system data structure comprising at least one tag representing the host file system; and a mapping data structure comprising at least one tag representing a mapping between the local file system and the host file system, wherein the mapping is used to map and convert files from the host file system to the local file system to support remote editing of files in the host file system from the local file system; and parsing the file system connection descriptor according to the metalanguage tags.

The Examiner cited col. 19, lines 53-67 and col. 20, lines 1-25 of Stedman as teaching the claim requirement of encoding the information in a metalanguage format comprising one or more tags, each tag having an identifier and a set of one or more attributes. (Final Office Action, pg. 3) Applicants traverse.

Stedman concerns a way to transfer information between a host and a client by having a host extension create a set of instructions that is transferred to the client computer. The client computer utilizes the set of instructions to create web pages displayed at the client computer. (Stedman, col. 2, lines 47-60)

The cited col. 19 mentions that a host extension creates an HTML document and inserts URLs within the document and tags that identify where the session ID is placed. Stedman defines the host extension as receiving information from a host computer and creating a set of

instructions that is transferred via the server application framework to the client computer. The client computer utilizes these instructions to create Web pages. (Stedman, col. 2, lines 47-55) The cited col. 19 further mentions that the server application framework replaces session ID tags with the appropriate session ID.

The cited col. 19 discusses how a host extension creates an HTML document with tags for the session ID to send to the client system. Nowhere does this cited col. 19 of Stedman anywhere teach or suggest that the host extension encode information on a file system connection descriptor in a metalanguage format comprising a local data system, a host system data structure, and a mapping data structure each comprising at least one tag. Moreover, nowhere does the cited col. 19 teach or suggest tags in a metalanguage format that represent the local file system, the host file system; and a mapping between the local file system and the host file system. Instead, the cited Stedman includes a set of instructions in a page that is substituted for actual data, not encoding information in tags comprising a descriptor on a local system data structure, host system data structure and mapping as claimed.

The Examiner cited col. 7, lines 3-20 and col. 24, lines 8-44 of Imai and col. 2, lines 55-63 of Stedman as teaching the details concerning the file system connection descriptor. (Final Office Action, pgs. 2-3) Applicants submit that these cited sections of Imai and Stedman do not teach or suggest the claim requirements of encoding information in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping used to map and convert files from the host file system to the local file system to support remote editing of files in the host file system from the local file system.

The cited col. 7 of Imai mentions that a file requesting client includes a connection unit for setting up a connection with a file server and a file requesting unit to request the file. A file receiving unit receives the file and file storage unit stores the file. Nowhere does this cited col. 7 anywhere teach or suggest encoding information in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping that is used to map and convert files from the host file system to the local file system to support remote editing of files in the host file system from the local file system as claimed. Instead, the cited col. 7 discusses client units to connect with a server, request a file, receive the requested file, display the file, etc. Although the cited col. 7 discusses how a file requesting

client connects with a file server, there is no teaching or suggestion of a file descriptor having tags with information on a local system data structure, a host system data structure, and a mapping data structure. Thus, the specific claimed file system connection descriptor is not taught or suggested.

The cited col. 24 of Imai mentions that a user program requests the transfer and display of file. A request handling unit handles the display request and the file request unit transmits the request. The file server program transfers the requested file to the requesting client. A multiple file transfer program may be used to transfer multiple files to the client. Although the cited col. 24 discusses operations to request and transfer one or more files, nowhere does the cited col. 24 anywhere teach or suggest the claim requirements of a file system connection descriptor having tags in a metalanguage format representing a local file system, a host file system, and a mapping used to map and convert files from the host file system to the local file system to support remote editing of files in the host file system from the local file system. Instead, the cited col. 24 concerns a file request and transfer operations to transfer a requested file from a server to client.

The cited col. 2, lines 55-63 of Stedman mentions that the client is linked to the server over the Internet and the server is linked to the host over an SNA network. Nowhere in this cited col. 2 of Stedman is there any teaching or disclosure of the claim requirement of a file system connection descriptor having tags in a metalanguage format representing a local file system, a host file system, and a mapping as claimed.

The Examiner, in responding to Applicants arguments on pages 6-7 of the Fifth Office Action, cited col. 8, lines 40-54 of Imai as teaching the claimed file system connection descriptor. This cited col. 8 discusses a menu transmitted to the client, where the menu is given as home pages available at the file server or pages that can be reached by tracing links from the home pages. Applicants submit that this cited menu does not disclose the claim requirements of a file system connection descriptor encoded in a metalanguage format having tags representing a local file system, a host file system, and a mapping between the host and local file system used to map and convert files from the host file system to the local file system to support remote editing of files in the host file system from the local file system as claimed. Instead, this cited col. 8 discusses a menu of home pages available at a server.

The Examiner cited col. 19, lines 21-27 of Harvey as teaching the claim requirement the mapping is used to map and convert files from the host file system to the local file system to support remote editing of files in the host file system from the local file system. (Final Office Action, pg. 5) Applicants traverse.

The cited col. 19 of Harvey discusses a file converter that provides a mapping between different file formats. Although the cited col. 19 discusses converting files from one format to another, nowhere is there any teaching or suggestion of converting a file from a host file system to a local file system to support remote editing of files in the host file system from the local file system. Moreover, the other cited references of Stedman and Imam also fail to teach this requirement, as acknowledged by the Examiner. Thus, no cited reference teaches or suggests or provides motivation to both map and convert files from a host file system to a local file system to support remote editing. Instead, the cited Harvey discusses file format conversion in general and not between different file systems to support remote editing of files.

Applicants submit that the Examiner's suggested combination of the cited patents constitute improper use of hindsight. The U.S. Court of Appeals for the Federal Circuit has made clear that some objective teaching of the suggestion or motivation to combine prior art references is needed. In re Dembiczak, 50 USPQ2d 1614, 1617 (Fed. Cir. 1999) ("Our case law makes clear that the best defense against the subtle but powerful attraction of a hindsight-based obviousness analysis is rigorous application of the requirement for a showing of the teaching or motivation to combine prior art references.") Here, the Examiner has proposed modifying Stedman and Imai with Harvey's discussion of converting files even though there is no teaching, suggestion, or mention in the cited art of the claim requirement of a mapping used to both map and convert files from a host file system to a local file system to support remote editing. Thus, the Examiner is engaging in improper use of hindsight to justify the proposed modification because the Examiner has not provided any objective teaching to support the proposed modification of the cited art.

Applicants submit that claims 1 and 15 are patentable over the cited combination because the cited Stedman, Imai, and Harvey, alone or in combination, does not teach or suggest all the requirements of claims 1 and 15.

Claim 2 recites a data structure embodied in a computer-readable storage medium, said data structure representing information describing a file system connection between a local file system located on a local system and a host file system located on a host system, wherein said data structure comprises a file system connection descriptor, said file system connection descriptor comprising: a local system data structure comprising at least one tag representing the local file system; a host system data structure comprising at least one tag representing the host file system; and a mapping data structure comprising at least one tag representing a mapping between the local file system and the host file system used to map and convert files from the host file system to the local file system to support remote editing of files in the host file system from the local file system, wherein the tags are encoded in a metalanguage format.

The Examiner cited col. 3, lines 38-49 of Stedman and col. 7, lines 4-23 and col. 8, lines 11-23 of Imai as teaching the requirements of claim 2. (Final Office Action, pg. 4) Applicants traverse.

The cited col. 3 of Stedman discusses multiple communication sessions having one browser application, one host extension object, one display control and one host computer, where a session ID is associated with each. The session ID is inserted in the hypertext link addresses. When the server receives a hypertext link from the client computer, the session ID is extracted and used to identify the host extension corresponding to the originating browser application.

Nowhere does the cited col. 3 anywhere teach or suggest information encoded in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping. Instead, the cited col. 3 concerns maintaining a session ID to use for multiple communication sessions. The particular claimed file system connection descriptor and tags are not disclosed in this cited col. 3.

The cited col. 7 of Imai mentions that a file requesting client includes a connection unit for setting up a connection with a file server and a file requesting unit to request the file. A file receiving unit receives the file and file storage unit stores the file. Nowhere does this cited col. 7 anywhere teach or suggest encoding information in a metalanguage format on a file system connection descriptor comprised of tags representing a local file system, a host file system, and a mapping used to map and convert files from the host file system to the local file system to

support remote editing of files in the host file system from the local file system as claimed. Instead, the cited col. 7 discusses client units to connect with a server, request a file, receive the requested file, display the file, etc. The specific claimed file system connection descriptor is not taught or suggested.

The cited col. 8 of Imai mentions a request handling unit to handle a file request and that the request processing unit searches a file list for the requested file corresponding to the file request from the file lists and transmits the searched file list to the file requesting client.

Although the cited col. 8 of Imai discusses how a request handling unit searches for a file, nowhere does the cited col. 8 anywhere teach or suggest tags in a metalanguage format representing a local file system, a host file system, and a mapping between the local file system and the host file system as claimed. There is no mention in the cited cols. 7 and 8 of Imai of a mapping between different file systems. Instead, the cited col. 8 discusses how a request for a file is handled.

Moreover, claim 2 additionally requires the claim requirement of a mapping data structure used to map and convert files from the host file system to the local file system to support remote editing. Applicants submit that this requirement provides additional grounds of patentability over the cited art for the reasons discussed above with respect to claims 1 and 15.

Applicants submit that claim 2 is patentable over the cited combination of art because the cited Stedman, Imai, and Harvey, alone or in combination, do not teach or suggest all the requirements of claim 2.

Claims 3-8, 9-14, and 16-21 are patentable over the cited art because they depend from one of claims 1, 2, and 15, respectively, which are patentable over the cited art for the reasons discussed above. The following dependent claims provide additional grounds of patentability over the cited art.

Claims 3, 9, and 16 depend from claims 2, 1, and 15, respectively, and further require that the mapping data structure comprises: a local file extension data structure storing a local file extension; a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied; and a transfer type data structure storing a transfer type that defines how data will be transferred between the host system and the local system for this mapping.

The Examiner cited col. 22, lines 16-53 of Imai as teaching the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. (Final Office Action, pg. 6) Applicants traverse.

The cited col. 22 mentions that a user requests the transfer and the display of a file by issuing a request and uses the URL to identify the file. A request handling unit in the client handles the display, the file request unit transmits the file request, and the file server program transfers the file to the file requesting client. The client may receive a file list. The list includes files having identifiers requested by the user.

The cited col. 22 of Imai discusses handling of a file request between server and client. Nowhere does the cited col. 22 anywhere teach or suggest the claim requirement of a host file pattern data structure storing a pattern describing a host file to which the local file extension will be applied. Instead, the cited col. 22 discusses how a file or list of files matching a request is returned to the client.

The Examiner cited col. 28, lines 38-65 of Imai as teaching the claim requirement of a transfer type data structure storing a transfer type that defines how data will be transferred between the host system and the local system for this mapping. (Final Office Action, pg. 6) Applicants traverse.

The cited col. 28 of Imai discusses a transfer condition for preventing a wasteful transfer of a file of a type which cannot be utilized at the file request client. If a type of the selected file satisfies the transfer condition, the multiple files are transferred. If the type of the selected file does not satisfy the transfer condition, then another file is selected.

Although the cited col. 28 discusses a condition indicating a file type to not transfer, the cited Imai does not teach or suggest the claim requirement of a transfer type data structure storing a transfer type that defines how data will be transferred between the host system and the local system for this mapping. Indicating file types not to transfer as in Imai is different from the claim requirement of a transfer type defining how data will be transferred between a host and local system for a mapping between file systems.

Accordingly, claims 3, 9, and 16 provide additional grounds of patentability over the cited art.

Conclusion

For all the above reasons, Applicant submits that the pending claims 1-21 are patentable over the art of record and in compliance with the definiteness and enablement requirements. Applicants submit herewith a petition for a one month extension of time. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0460.

The attorney of record invites the Examiner to contact him at (310) 553-7977 if the Examiner believes such contact would advance the prosecution of the case.

Dated: April 17, 2006

By: /David Victor/

David W. Victor
Registration No. 39,867

Please direct all correspondences to:

David Victor
Konrad Raynes & Victor, LLP
315 South Beverly Drive, Ste. 210
Beverly Hills, CA 90212
Tel: 310-553-7977
Fax: 310-556-7984